

OFFICIAL FILE

I.C.C. DOCKET NO. 00-0308

Exhibit No. 1

**BEFORE THE
ILLINOIS COMMERCE COMMISSION**

Witness _____

Date 6-9-00 Reporter G

UniDial Communications, Inc.)

)

Application for Certificate of Service Authority to)

Docket No. 00-0308

Expand its Authority to Include the Provision)

of Facilities-based Interexchange and Local)

Exchange Telecommunications Services in)

the State of Illinois)

**TESTIMONY OF JOHN J. GREIVE
ON BEHALF OF
UNIDIAL COMMUNICATIONS, INC.**

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Dated: June 5, 2000

I. INTRODUCTION

1 **Q. PLEASE STATE YOUR NAME, BUSINESS ADDRESS AND TELEPHONE**
2 **NUMBER.**

3 **A.** My name is John J. Greive. My business address is UniDial Communications, Inc., 1901
4 Eastpoint Parkway, Louisville, Kentucky 40223. My phone number is (502) 244-6666.

5 **Q. WHAT IS YOUR POSITION WITH UNIDIAL COMMUNICATIONS, INC.**
6 **("UNIDIAL")?**

7 **A.** I am Director of Legal Services and General Counsel of UniDial Communications, Inc.

8 **Q. WHAT ARE YOUR RESPONSIBILITIES AS DIRECTOR OF LEGAL SERVICES**
9 **AND GENERAL COUNSEL?**

10 **A.** In my capacity as Director of Legal Services and General Counsel, I coordinate all UniDial
11 regulatory matters including state certifications and tariffs as well as interconnection
12 negotiations and agreements.

13 **Q. PLEASE BRIEFLY DESCRIBE YOUR PREVIOUS PROFESSIONAL**
14 **EXPERIENCE AND QUALIFICATIONS.**

15 **A.** I received my B.S. in Mathematics from Bellarmine College and my J.D. from the University
16 of Louisville. Prior to joining UniDial in July 1996, I maintained a general practice as a
17 partner with Chandler, Saksetski & Greive. I also worked as an associate in the corporate
18 section of a medium sized firm in Louisville, Kentucky.

19 **Q. HAVE YOU TESTIFIED BEFORE THE ILLINOIS COMMERCE COMMISSION**
20 **("COMMISSION") PREVIOUSLY?**

21 **A.** Yes, I have. I previously provided testimony on behalf of UniDial in support of its original
22 applications to provide resold interexchange and local exchange services in Illinois.

1 Q. ARE YOU FAMILIAR WITH THE APPLICATION THAT WAS SUBMITTED BY
2 UNIDIAL TO THE COMMISSION ON APRIL 24, 2000 FOR A CERTIFICATE OF
3 SERVICE AUTHORITY TO EXPAND UNIDIAL'S AUTHORITY TO INCLUDE
4 THE PROVISION OF FACILITIES-BASED INTEREXCHANGE AND LOCAL
5 EXCHANGE TELECOMMUNICATIONS SERVICES WITHIN THE STATE OF
6 ILLINOIS ("APPLICATION")?

7 A. Yes I am.

8 Q. IS THERE ANY OTHER UPDATED INFORMATION OF WHICH THE
9 COMMISSION SHOULD BE AWARE?

10 A. Not at this time.

11 Q. DO YOU RATIFY AND CONFIRM THE STATEMENTS THAT ARE MADE IN
12 UNIDIAL'S APPLICATION?

13 A. Yes I do.

14 II. PURPOSE AND SUMMARY

15 Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?

16 A. The purpose of my testimony is to describe the intrastate telecommunications services
17 proposed to be offered by UniDial in Illinois, and to demonstrate that the grant of UniDial's
18 application to expand its current authority is in the public interest. My testimony specifically
19 relates to UniDial's managerial, financial and technical competence to provide the services
20 for which authority is requested.

21 Q. PLEASE DESCRIBE THE AUTHORITY THAT UNIDIAL SEEKS BY ITS
22 APPLICATION.

23 A. UniDial seeks authority to expand its current resold authority to include the provision of
24 facilities-based intrastate interexchange and local exchange telecommunications services

1 throughout the State of Illinois pursuant to Sections 13-403, 13-404, and 13-405 of the
2 Public Utilities Act.

3 **Q. PLEASE DESCRIBE THE CORPORATE STRUCTURE OF UNIDIAL.**

4 **A.** UniDial is a privately-owned Kentucky corporation, formed on March 3, 1993. UniDial is
5 a wholly-owned subsidiary of UniDial Holdings, Inc., a Delaware corporation. UniDial was
6 formed to provide all forms of telecommunications services, including local exchange and
7 interexchange services.

8 **Q. IS UNIDIAL LEGALLY AUTHORIZED TO DO BUSINESS IN ILLINOIS?**

9 **A.** Yes. UniDial's Certificate of Authority to Transact Business in the State of Illinois was filed
10 with its Application to expand its current authority.

11 **III. MANAGERIAL AND TECHNICAL QUALIFICATIONS**

12 **Q. PLEASE ADDRESS UNIDIAL'S MANAGERIAL AND TECHNICAL**
13 **QUALIFICATIONS.**

14 **A.** UniDial's management team is well qualified to execute its business plan, having extensive
15 managerial, financial, and technical experience in the telecommunications industry.
16 Descriptions of the extensive telecommunications and managerial experience of UniDial's
17 key personnel were attached as Exhibit 5 to UniDial's Application.

18 **IV. FINANCIAL QUALIFICATIONS**

19 **Q. PLEASE DESCRIBE UNIDIAL'S FINANCIAL QUALIFICATIONS.**

20 **A.** UniDial has access to the financing and capital necessary to conduct the telecommunications
21 operations as specified in its Application. UniDial is financially qualified to render the

1 proposed service. Specifically, Applicant will rely on the financial resources of its parent
2 company, UniDial Holdings, Inc. for the provision of telecommunications services in the
3 State of Illinois. In demonstration of its financial qualifications, UniDial has attached to its
4 application as Exhibit 6, audited financial statement of UniDial Holdings, Inc.

5 Exhibit 6 demonstrates that UniDial possesses the financing and working capital
6 necessary to fulfill any obligations it may undertake with respect to the operation and
7 maintenance of the requested service. UniDial has sufficient financial capability to provide
8 and maintain its interexchange and local exchange telecommunications services throughout
9 Illinois and sufficient financial capability to meet any lease or ownership obligations it may
10 incur.

11 **V. UNIDIAL'S PROPOSED SERVICES**

12 **Q. PLEASE DESCRIBE THE TYPES OF SERVICES THAT UNIDIAL PLANS TO**
13 **OFFER IN ILLINOIS.**

14 **A.** In addition to its current resold offerings, UniDial proposes to provide facilities-based
15 intrastate interexchange telecommunications services, including direct-dialed ("1+") message
16 telecommunications services (including 800/888/877 services), operator services (to
17 presubscribed customers only), and post-paid calling card services. UniDial's proposed
18 facilities-based local exchange services will allow its customers to originate and terminate
19 local calls to other customers served by UniDial as well as customers served by all other
20 Illinois-certificated LECs. Applicant's services will be available on a full-time basis, 24

1 hours a day, seven days a week. Subject to demand and overall economic circumstances,
2 UniDial may subsequently offer additional services.

3 **Q. WHAT FACILITIES WILL UNIDIAL USE TO PROVIDE ITS PROPOSED LOCAL**
4 **TELECOMMUNICATIONS SERVICES?**

5 **A.** UniDial does not currently have or use any equipment or facilities in Illinois, and requests
6 facilities-based authority so that it can install a switch in order to offer its customers
7 telecommunications service at more competitive rates.

8 **Q. WILL UNIDIAL HAVE ANY REPAIR PERSONNEL LOCATED IN ILLINOIS?**

9 **A.** UniDial will monitor its network through a 24 hour remote monitoring center. Network
10 operations, status and troubleshooting will be directed from the control center. Any
11 problems requiring direct on-site intervention will be handled by trained technicians located
12 in Illinois. UniDial will also make arrangements with its underlying carriers to ensure
13 prompt and adequate repairs to any leased or resold facilities.

14 **Q. HAS UNIDIAL EVER PROVIDED SERVICE UNDER ANY OTHER NAME?**

15 **A.** Yes. UniDial previously provided service in Illinois under the name UniDial Incorporated.
16 UniDial changed its name to UniDial Communications, Inc., and notified the Commission
17 of the name change in March 1998.

1 **Q. HAVE ANY COMPLAINTS OR JUDGMENTS BEEN LEVIED AGAINST**
2 **UNIDIAL?**

3 **A.** Like all active telecommunications carriers that have been operating for any significant
4 period of time, UniDial has had some complaints against it. However, UniDial has worked
5 with its customers and any relevant agency to resolve these matters expeditiously and
6 satisfactorily. UniDial continues to work to resolve any complaints it has against it, and is
7 confident that its procedures and policies regarding the solicitation and activation of
8 customer accounts keeps any complaints to a minimum.

9 **Q. HOW DOES UNIDIAL PLAN TO SOLICIT CUSTOMERS?**

10 **A.** UniDial markets its services through a network of independent agents as well as a
11 direct sales force. UniDial believes its extensive training programs have helped produce a
12 well-educated, fast-growing network of independent agents and sales personnel. In order to
13 insure that its agents and sales personnel are properly trained, UniDial offers its agents and
14 sales personnel a two day intensive program designed specifically for new agents and sales
15 consultants to explain the operations of the company, and to teach the basics of telephony,
16 industry competition, and proper selling techniques. UniDial also requires its independent
17 agents and consultants to abide by UniDial's marketing policies and to follow proper
18 marketing techniques, which are delineated in UniDial's marketing guideline handbook,
19 attached hereto. These guidelines are distributed to all agents and sales personnel who
20 market UniDial's services on its behalf. Furthermore, any marketing plans which deviate

1 from UniDial's standard marketing guidelines must be submitted for UniDial's approval prior
2 to implementation.

3 **VI. COMPLIANCE WITH THE COMMISSION'S RULES, REGULATIONS AND**
4 **POLICIES.**

5 **Q. IF AUTHORIZED TO PROVIDE COMPETITIVE TELECOMMUNICATIONS**
6 **SERVICES, WILL UNIDIAL ABIDE BY THE RULES, REGULATIONS, POLICIES**
7 **AND ORDERS OF THIS COMMISSION, AND THE LAWS OF THE STATE OF**
8 **ILLINOIS, IN ITS PROVISION OF COMPETITIVE INTRASTATE LOCAL**
9 **EXCHANGE SERVICES?**

10 **A.** Yes we will. UniDial will continue to provide service in Illinois in full compliance with any
11 and all rules and regulations that have been or may be adopted relating to the provision of
12 local exchange service, as well as any other applicable state or federal rules, regulations, or
13 statutes. For example, UniDial will comply with any competitively neutral requirements that
14 the Commission or the State of Illinois may feel are necessary to preserve and advance
15 universal service, protect the public safety and welfare, ensure the continued quality of local
16 services, and safeguard the rights of consumers. UniDial also will comply with all statutory
17 and Commission requirements concerning, among other things, the filing of tariffs; customer
18 notification of rate increases; customer billing and credit issues; access to 9-1-1 services;
19 access to telecommunications for persons with disabilities; pay-per-call services; and the
20 filing of regulatory reports and the payment of regulatory assessments.

1 **Q. IF GRANTED CERTIFICATION TO PROVIDE LOCAL SERVICE IN ILLINOIS,**
2 **WILL UNIDIAL ABIDE BY THE RULES AND REGULATIONS OF THIS**
3 **COMMISSION, AS NOW ADOPTED OR THAT MAY BE ADOPTED IN THE**
4 **FUTURE?**

5 **A. Yes we will.**

6 **Q. ARE YOU AWARE THAT, IF GRANTED CERTIFICATION TO PROVIDE LOCAL**
7 **EXCHANGE SERVICE, UNIDIAL MUST COMPLY WITH THE COMMISSION'S**
8 **RULES CONCERNING THE PRESERVATION OF RECORDS IN ACCORDANCE**
9 **WITH 83 ILL. ADM. CODE PART 705?**

10 **A. Yes I am. UniDial recognizes its obligation to comply with the regulations imposed on**
11 LECs concerning the preservation of records to the same extent and in the same manner as
12 the incumbent LECs.

13 **Q. DOES UNIDIAL INTEND TO COMPLY WITH THE COMMISSION'S RULES**
14 **CONCERNING THE PROVISION OF TELEPHONE RELAY SERVICES AND**
15 **OTHER REQUIREMENTS CONCERNING THE PROVISION OF EQUIPMENT**
16 **AND SERVICE TO PERSONS WITH DISABILITIES (83 ILL. ADM. CODE 755, 756,**
17 **AND 757 AND PUBLIC UTILITIES ACT § 13-703)?**

18 **A. Yes we do. To the extent they apply to competitive providers of interexchange and local**
19 exchange services, UniDial will comply with the Commission's regulations concerning
20 Telecommunications Relay Services, access for persons with disabilities, and telephone
21 assistance programs. UniDial intends to comply with those requirements including the
22 provision of TTY distribution and the Telecommunications Relay Service by contracting
23 with incumbent LECs.

1 **Q. WILL UNIDIAL COMPLY WITH THE COMMISSION'S RULES CONCERNING**
2 **THE UNIVERSAL SERVICE OBLIGATIONS OF LOCAL EXCHANGE**
3 **CARRIERS, INCLUDING REGULATIONS CONCERNING CONTRIBUTIONS TO**
4 **THE UNIVERSAL TELEPHONE ASSISTANCE CORPORATION ("UTAC")?**
5 **WILL UNIDIAL SIGN AND RETURN THE UTAC AND THE ILLINOIS**
6 **TELECOMMUNICATIONS ACCESS CORPORATION ("ITAC") ALL OF THE**
7 **NECESSARY MEMBERSHIP FORMS IN A TIMELY MANNER?**

8 **A.** Yes we will. UniDial recognizes that the responsibility to ensure that the goal of universal
9 service is met for all consumers must be shared by all LECs. UniDial will comply with the
10 requirements of Ill. Adm. Code Part 757, including joining the Universal Telephone
11 Assistance Corporation ("UTAC"), and meeting the requirements concerning the solicitation
12 and remittance of contributions, and the filing of appropriate reports with the Commission
13 in the same manner as the incumbent LECs. UniDial will comply with all rules and
14 requirements imposed on LECs, as now adopted or as may be adopted in the future, in order
15 to bear its fair share of that responsibility. UniDial will complete and return the requisite
16 membership forms in a timely manner.

17 **Q. WILL UNIDIAL SOLICIT, COLLECT, AND REMIT TO UTAC THE VOLUNTARY**
18 **CONTRIBUTIONS COLLECTED MONTHLY FROM ITS TELEPHONE**
19 **SUBSCRIBERS TO SUPPORT THE UNIVERSAL TELEPHONE SERVICE**
20 **ASSISTANCE PROGRAM ("UTSAP") (PUBLIC UTILITIES ACT § 13-301.1)?**

21 **A.** Yes, we will.

22 **Q. WILL UNIDIAL COLLECT AND REMIT TO ITAC THE LINE CHARGE**
23 **AMOUNT COLLECTED MONTHLY FROM ALL TELEPHONE SUBSCRIBERS**
24 **FOR THE TTY EQUIPMENT LOAN PROGRAM AND TELECOMMUNICATIONS**
25 **RELAY SERVICE?**

26 **A.** Yes, we will.

1 Q. WILL UNIDIAL COMPLY WITH 83 ILL. ADM. CODE 772.55(a)(1) "BILLING"
2 AND 772.100 (d) "NOTICES"?

3 A. Yes, we will.

4 Q. WILL UNIDIAL COMPLY WITH 83 ILL. ADM. CODE 735 REGARDING
5 PROCEDURES GOVERNING THE ESTABLISHMENT OF CREDIT, BILLING,
6 DEPOSITS, TERMINATION OF SERVICE AND ISSUANCE OF TELEPHONE
7 DIRECTORIES FOR TELEPHONE UTILITIES?

8 A. Yes, UniDial will comply with 83 Ill. Adm. Code 735, except to the extent that the
9 Commission grants UniDial's request for a waiver of 735.180, as detailed below.

10 Q. HOW WILL UNIDIAL GUARD AGAINST SLAMMING?

11 A. UniDial prevents unauthorized switching of customers by obtaining a signed letter of
12 authorization from all new customers. UniDial will comply with Illinois law and the Federal
13 Communications Commission's ("FCC's") regulations regarding how interexchange carriers
14 may change a consumer's Primary Interchange Carrier ("PIC"). UniDial will also comply
15 with FCC's regulations regarding how carriers may change a consumer's primary local
16 exchange provider. UniDial has not yet promulgated a written policy to its employees.
17 However, before beginning provision or marketing of service, UniDial will establish such
18 a policy, which will comply with federal and state guidelines, as described above.

19 **VIII. WAIVERS AND VARIANCES**

20 Q. UNIDIAL HAS REQUESTED A WAIVER FROM CERTAIN PROVISIONS OF THE
21 ILL. ADM. CODE. WHAT IS THE BASIS FOR THESE REQUESTS?

22 A. The Commission in other cases has found that it is not necessary to apply certain regulatory
23 provisions to competitive service providers and has exempted competitive carriers from the

1 application of these provisions. It is my understanding that the Commission has previously
2 waived or declared inapplicable portions of 83 Ill. Adm. Code Parts 710 and 735 for
3 competitive carriers as such waivers reduce the economic burdens of regulation and are not
4 inconsistent with the law or the purposes and policies of Article XIII of the Act.

5 **Q. PLEASE DESCRIBE UNIDIAL'S REQUEST FOR A VARIANCE FROM 83 ILL.**
6 **ADM. CODE PART 735.180.**

7 **A.** UniDial seeks a variance of Part 735.180, which requires LECs to publish and distribute
8 directories to their customers. UniDial plans to negotiate an agreement with its underlying
9 carrier(s), pursuant to which the underlying carrier will include UniDial's customer listings
10 in its directories and distribute them to UniDial's customers. As a result, UniDial requests
11 a variance from the requirement that it publish and distribute its own directories.

12 **Q. PLEASE DISCUSS THE BASIS FOR UNIDIAL'S REQUEST FOR A WAIVER OF**
13 **83 ILL. ADM. CODE PART 710.**

14 **A.** Part 710 requires compliance with the Uniform System of Accounts ("USOA"). While this
15 provision is appropriately applied to incumbent LECs that have market power, it imposes
16 unnecessary and burdensome requirements on new entrants that are inconsistent with a
17 competitive environment. UniDial previously requested and received a waiver of Part 710
18 for its resold authorities, and we request that the Commission similarly waive this
19 requirement in this proceeding.

20 Finally, it is my understanding that the Commission has waived Part 710 for other
21 competitive carriers, including MFS Intelenet of Illinois, Inc. (Docket No. 93-0409) and MCI

1 Metro Access Transmission Services, Inc. (Docket No. 94-0400). UniDial seeks the same
2 treatment.

3 **Q. PLEASE DESCRIBE UNIDIAL'S REQUEST FOR A WAIVER OF THE**
4 **REQUIREMENT TO MAINTAIN BOOKS AND RECORDS IN THE STATE OF**
5 **ILLINOIS PURSUANT TO 83 ILL. ADM. CODE 250.20.**

6 **A.** UniDial requests a waiver pursuant to 83 Ill. Adm. Code 250.20 so that it may continue to
7 maintain its books and records at its principal place of business outside the State of Illinois.
8 UniDial requests that the Commission grant it a waiver to maintain its books and records
9 outside the State of Illinois and in Kentucky at its principal place of business. Waiver of this
10 requirement is consistent with the waiver previously granted in the proceeding authorizing
11 the provision of resold telecommunications services by UniDial.

12 **IX. COMPLIANCE WITH 9-1-1 REGULATIONS**

13 **Q. ARE YOU AWARE THAT, IF GRANTED CERTIFICATION TO PROVIDE LOCAL**
14 **EXCHANGE SERVICE, UNIDIAL WILL BE REQUIRED TO COMPLY WITH THE**
15 **COMMISSION'S RULES CONCERNING THE IMPLEMENTATION OF 9-1-1**
16 **EMERGENCY SERVICES, AND THE FILING OF REPORTS ON 9-1-1**
17 **IMPLEMENTATION?**

18 **A.** Yes I am, and UniDial intends to comply with those requirements and fully meet all of its
19 obligations as a local exchange carrier by coordinating or making arrangements with its
20 underlying carrier. Please note that all subsequent answers involving 9-1-1 assumes
21 involvement of its underlying carrier to implement emergency services.

1 **Q. WHO IS THE PERSON WITHIN UNIDIAL THAT IS RESPONSIBLE FOR THE**
2 **HANDLING OF 9-1-1 ISSUES?**

3 **A. Ryan Karstens is currently the person within UniDial who is responsible for the handling of**
4 **9-1-1 issues. He may be reached at UniDial's offices in Kentucky at (502) 326-5725.**

5 **Q. IS UNIDIAL PREPARED TO HANDLE 9-1-1 SERVICE PURSUANT TO THE**
6 **EMERGENCY TELEPHONE SYSTEMS ACT, 83 ILL. ADM. CODE 725 AND 83**
7 **ILL. ADM. CODE 720?**

8 **A. Yes, we are.**

9 **Q. WILL UNIDIAL COORDINATE WITH THE INCUMBENT LEC(S) AND LOCAL**
10 **9-1-1 SYSTEMS TO MINIMIZE OBSTACLES AND PROVIDE TRANSPARENT**
11 **SERVICE TO THE END-USERS? WILL THERE BE ANY ADDITIONAL CALL**
12 **SETUP TIME? WILL THERE BE ANY COSTS ASSOCIATED WITH THE**
13 **TRANSITION CHARGED TO THE 9-1-1 SYSTEM?**

14 **A. Yes, we will coordinate with the ILEC and local 9-1-1 systems to minimize obstacles and**
15 **provide transparent service to the end users. There will be no additional call set-up time as**
16 **trunking to the incumbent local exchange carrier is established in a manner similar to as if**
17 **UniDial were an incumbent end office. There will be no additional costs above and beyond**
18 **the costs of keeping up to date on the Master Street Address Guide ("MSAG").**

19 **Q. DOES UNIDIAL INTEND TO BILL EACH 9-1-1 SYSTEM FOR FEATURES**
20 **ASSOCIATED WITH 9-1-1, I.E., BUILDING AND MANAGEMENT OF**
21 **DATABASE, SELECTIVE ROUTING, NETWORKING AND DEDICATED**
22 **TRUNKS? IF SO, HOW WILL THESE COSTS BE DETERMINED?**

23 **A. No, UniDial does not intend to bill each 9-1-1 system.**

24 **Q. WILL UNIDIAL FILE TARIFFS FOR ALL SERVICES AND CHARGES**
25 **ASSOCIATED WITH 9-1-1, IF ANY?**

26 **A. Yes, we will file tariffs for all services and charges associated with 9-1-1, if any.**

1 **Q. WHO WILL BE RESPONSIBLE FOR BUILDING AND MAINTAINING THE 9-1-1**
2 **DATABASE FOR UNIDIAL'S CUSTOMERS? HOW OFTEN WILL UPDATES BE**
3 **PERFORMED ON THE 9-1-1 DATABASE?**

4 **A. UniDial expects the incumbent LEC to provide the build-out and maintenance for the 9-1-1**
5 **database. UniDial, in turn, will pay the appropriate fees for the use of this service. UniDial**
6 **expects to update its database upon receiving similar updates from the incumbent carrier.**

7 **Q. DOES UNIDIAL HAVE PROCEDURES FOR THE TRANSITIONING OF 9-1-1**
8 **SURCHARGE COLLECTION AND DISPERSEMENT TO THE LOCAL 9-1-1**
9 **SYSTEM?**

10 **A. UniDial is in the process of building accounting tracking for all surcharges including those**
11 **associated with 9-1-1. In addition, UniDial, through the ILEC, will contact the appropriate**
12 **municipality or 9-1-1 system, if necessary, by certified mail to establish procedures for the**
13 **handling and transition of any surcharges to that municipality or 9-1-1 system.**

14 **Q. WILL UNIDIAL'S PROPOSAL REQUIRE ANY NETWORK CHANGES TO ANY**
15 **OF THE 9-1-1 SYSTEMS?**

16 **A. Our proposal should not require any network changes to the existing 9-1-1 systems.**

17 **Q. WILL UNIDIAL'S CUSTOMERS RECEIVE THE SAME QUALITY OF 9-1-1**
18 **SERVICE THAT IS CURRENTLY OFFERED FROM THE INCUMBENT LOCAL**
19 **EXCHANGE CARRIERS?**

20 **A. Yes, UniDial's customers will continue to receive the same level of 9-1-1 service that they**
21 **currently receive.**

1 **X. CONSUMER COMPLAINTS**

2 **Q. WHO IS THE PERSON WITHIN UNIDIAL IS RESPONSIBLE FOR THE**
3 **HANDLING OF CONSUMER COMPLAINTS, INCLUDING THOSE THAT MAY**
4 **BE FORWARDED TO THE COMPANY BY THIS COMMISSION?**

5 **A. Linda Hunt is responsible for the handling of consumer complaints. She may be reached at**
6 UniDial's offices in Kentucky, at (502) 244-6666. In addition, customers with inquiries or
7 complaints may reach UniDial at its toll-free number, (800) 393-7300.

8 **Q. THE COMMISSION'S CONSUMER SERVICES DIVISION REQUESTS THAT**
9 **CARRIERS THAT ARE CERTIFIED TO PROVIDE LOCAL EXCHANGE**
10 **SERVICE NOTIFY THE DIVISION AT LEAST ONE MONTH PRIOR TO THE**
11 **ACTIVATION OF LOCAL EXCHANGE SERVICE, IN ORDER THAT THE**
12 **DIVISION MAY ASSURE THE NEW ENTRANT'S COMPLIANCE WITH THE**
13 **COMMISSION'S RULES. WILL UNIDIAL SO NOTIFY THE DIVISION ON A**
14 **TIMELY BASIS PRIOR TO THE ACTIVATION OF LOCAL SERVICE?**

15 **A. Yes, we will.**

16 **XI. PUBLIC INTEREST**

17 **Q. PLEASE DESCRIBE THE PUBLIC INTEREST BENEFITS ASSOCIATED WITH**
18 **UNIDIAL'S PROPOSED OFFERING OF INTRASTATE INTEREXCHANGE**
19 **TELECOMMUNICATIONS SERVICES IN ILLINOIS.**

20 **A. Grant of UniDial's application will serve the public interest by expanding the availability of**
21 technologically advanced, competitively-priced telecommunications services to consumers
22 in Illinois. The presence of UniDial in this market, and its ability to provide facilities-based
23 telecommunications service, will increase the incentive for other telecommunications service
24 providers to operate more efficiently, offer more innovative services, reduce their prices and
25 improve their quality of service.

1 **XII. CONCLUSION**

2 **Q. DOES THIS CONCLUDE YOUR TESTIMONY?**

3 **A. Yes, it does.**